

**UNITED STATES DISTRICT COURT  
Western District of Texas  
Austin Division**

JEAN JONES,  
*Plaintiff*

v.

PORTFOLIO RECOVERY  
ASSOCIATES LLC  
PORTFOLIO SERVICES, LLC, and  
WESTERN SURETY COMPANY  
*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§

CASE NUMBER: 1:16-cv-00572-RP

**PLAINTIFF'S VOIR DIRE QUESTIONS**

1. Your full name and age
2. List all cities or suburbs where you have lived for the last ten years
3. Do you own your home or rent it?
4. What is your current occupation and employer, and how long have you worked there?
5. What other jobs and employers have you had during your working life?
6. If you are married, describe your spouse's occupation, employer, and number of years worked there (if spouse is retired, please so state and give this information about past employment)?
7. Please provide employment information for others who live with you, and any adult children?
8. What is your primary source of news?
9. If the Court has already made a determination of liability, would you be able to follow the Court's determination, even if you personally disagree with it?
10. What organizations do you belong to or participate in?

11. Do you know or have you ever had any dealings with the following attorneys:
  - a. Michael Wood or Celetha Chatman; or Robert Zimmer or Amy Clark
  - b. Robbie Malone or Eugene Xerxes Martin, IV.
12. Do you know or recognize any of the other prospective jurors? If so, what's the nature of your relationship with that person?
13. Have you ever served on a jury?
  - a. If so, how many times?
  - b. What kinds of cases?
14. Are there any facts or circumstances you believe that the court or the parties should know that might affect your ability to serve as a fair and impartial juror in this case?
15. Do you believe that lawsuits are a proper means to vindicate the rights of an individual wronged by another?
16. Do you think there are too many lawsuits or that people are too quick to sue?
17. Do you have any difficulty with the notion that a person can receive financial compensation for emotional pain and suffering if the facts and law support it?
18. Have you been employed by a business or law office which collects debts or have family members or close friends who are so employed?
19. Have you been engaged in or employed by a business or individual who refers accounts to a debt collector for collection, or have family members or close friends who are so employed?
20. Do you have family or friends who work in banking, mortgage, or finance businesses?
  - a. How often have such people discussed their business with you?

21. Do you have family or friends who own businesses, or are executive level employees?

a. How often have such people discussed their business with you?

22. Are you willing to award whatever damages the evidence justifies, regardless of your personal feelings for either party?

Respectfully Submitted,

By: /s/ Celetha Chatman  
One of Plaintiff's Attorneys

Michael Wood  
Celetha Chatman  
***Community Lawyers Group, Ltd.***  
73 W. Monroe Street, Suite 514  
Chicago, IL 60603  
Ph: (312)757-1880  
Fx: (312) 265-3227  
mwood@communitylawyersgroup.com  
cchatman@communitylawyersgroup.com

Robert Zimmer  
TX Bar No. 24098662  
707 West 10<sup>th</sup> Street  
Austin, TX 78701  
Phone: (512) 434-0306  
Fax: (310) 943-6954  
zimmerlawTX@gmail.com

**CERTIFICATE OF SERVICE**

I, Celetha Chatman, an attorney, hereby certify that on August 17, 2017, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all attorneys of record.

Respectfully submitted,

By: s/Celetha Chatman

Celetha Chatman  
Michael J. Wood  
**Community Lawyers Group, Ltd.**  
73 W. Monroe, Suite 502  
Chicago, IL 60603  
Tel: 312-757-1880  
Fax: 312-265-3227  
Email: cchatman@communitylawyersgroup.com  
mwood@communitylawyersgroup.com